

IN THE UNITED STATES DISTRICT COURT FOR MARYLAND,  
SOUTHERN DISTRICT

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BEYOND SYSTEMS, INC., )  
Plaintiff, )  
v. ) Case No. PJM 08 cv 0921  
WORLD AVENUE USA, LLC, *et al.*, )  
Defendants. )  
\_\_\_\_\_  
)

**Affidavit of Paul A. Wagner Regarding**  
**Count of Emails Containing Certain Business Names and Domain Names**

I, Paul A. Wagner, state the following under oath:

I am over the age of 18 years and have personal knowledge of the matters stated herein. I am the president of Beyond Systems, Inc.

I have searched the 68,300 emails that initially gave rise to this suit and have found the following numbers of emails containing the following trade names and domain names:

17476 emails contain: SuperbRewards  
12087 emails contain: National Survey Panel  
9709 emails contain: YourSmartRewards  
9086 emails contain: MyPremiumRewards  
4858 emails contain: Consumer Incentive Promotions  
4079 emails contain: Your Smart Rewards  
3471 emails contain: Consumer Taste Panel  
3469 emails contain: ProductOpinionPanel  
2831 emails contain: NationalSurveyPanel  
1180 emails contain: Brand Survey Panel  
906 emails contain: NationalSurveyPanel.com  
341 emails contain: Superb Rewards  
292 emails contain: eMarket Research  
264 emails contain: Market Research Group  
264 emails contain: eMarket Research Group  
134 emails contain: OnlineGiftRewards  
131 emails contain: SuperbRewards.com  
126 emails contain: OnlineGiftRewards.com

116 emails contain: eMarketResearch  
82 emails contain: eMarketResearchGroup  
79 emails contain: TopConsumerGifts.com  
78 emails contain: BrandSurveyPanel  
74 emails contain: eMarketResearchGroup.com  
66 emails contain: ExclusiveGiftCards  
61 emails contain: Premium Holiday Gifts  
60 emails contain: YourSmartRewards.com  
56 emails contain: My Exclusive Rewards  
50 emails contain: Product Research Panel  
39 emails contain: National Issue Panel  
38 emails contain: America's Top Brands  
37 emails contain: ConsumerIncentivePromotion  
36 emails contain: ConsumerIncentivePromotions.com  
36 emails contain: Exclusive Gift Cards  
36 emails contain: HotGiftZone  
34 emails contain: Online Gift Rewards  
33 emails contain: ConsumerTastePanel  
26 emails contain: ExclusiveGiftCards.com  
23 emails contain: TheUseful  
21 emails contain: ConsumerTastePanel.com  
21 emails contain: My Choice Rewards  
18 emails contain: TopGiftIncentives  
17 emails contain: My Cool Rewards  
17 emails contain: Premium Products Online  
16 emails contain: YourMP3Player.com  
15 emails contain: MyCoolRewards  
14 emails contain: 123SpecialGifts  
12 emails contain: MySelectGifts  
11 emails contain: Hot Gift Zone  
11 emails contain: My Premium Rewards  
9 emails contain: PremiumProductsOnline  
8 emails contain: Get Special Gifts  
8 emails contain: GetSpecialGifts  
8 emails contain: MyExclusiveRewards  
7 emails contain: TopGiftIncentives.com  
6 emails contain: Americas Top Brands  
6 emails contain: MySupremeRewards  
6 emails contain: MySupremeRewards.com  
5 emails contain: ExclusiveGiftCenter  
5 emails contain: HotGiftZone.com  
4 emails contain: 123SpecialGifts.com  
4 emails contain: NationalIssuePanel  
4 emails contain: PremiumProductsOnline.com  
3 emails contain: Online Survey Panel  
3 emails contain: Product Opinion Panel

3 emails contain: Your Exclusive Rewards  
3 emails contain: ExpRewards  
3 emails contain: MyCoolRewards.com  
3 emails contain: ProgramRewardCenter  
2 emails contain: IncentiveReward  
2 emails contain: My Supreme Rewards  
2 emails contain: MyPremiumRewards.com  
2 emails contain: BrandSurveyPanel.com  
2 emails contain: IncentiveRewardCenter  
2 emails contain: MyPremiumRewards.com  
1 emails contain: AmericasTopBrands  
1 emails contain: AmericasTopBrands.com  
1 emails contain: Get A Gift Online  
1 emails contain: IGotMyFreeGift  
1 emails contain: Incentive Reward  
1 emails contain: Incentive Reward Center  
1 emails contain: ProductResearchPanel  
1 emails contain: HolidayShoppingRewards.com  
1 emails contain: MyChoiceRewards  
1 emails contain: MyExclusiveRewards.com  
1 emails contain: SurveyRewards.com  
1 emails contain: YourExclusiveRewards  
1 emails contain: YourExclusiveRewards.com

Exhibit 38 lists (1) the original set of domain names, trade names and addresses from which Plaintiff's Exhibit 23 was derived; (2) a list of World Avenue domain names obtained from a Google search of "operated by Net Radiance"; (3) domains obtained by performing reverse lookups on IP addresses used by multiple World Avenue companies, 213.200.112.\* and 66.7.179.\*; and (4) domain names found by a reverse DNS lookup on a domain used by Kitara Media, coolpremiumsnow.com (at 69.17.220.125).

On January 19, 2010, per Exhibit 47, I captured pages from the professional networking website called LinkedIn.com showing World Avenue officers and employees employed simultaneously at multiple World Avenue companies.

I solemnly declare and affirm under the penalties of perjury that the foregoing statements are true and correct.



A handwritten signature in black ink, appearing to read "Paul A. Wagner". It is written in a cursive style with a horizontal line underneath it.

Paul A. Wagner

March 8, 2010